Department of Energy
Office of Civilian Radioactive Waste Management
Yucca Mountain Site Characterization Office
P.O. Box 98608
Las Vegas, NV 89193-8608

NOV 02 1994

Michael D. Voegele
Science Applications International Corporation
Bank of America Center, Suite 407
101 Convention Center Drive
Las Vegas, NV 89109

VERIFICATION OF CORRECTIVE ACTION OF CORRECTIVE ACTION REQUEST (CAR) YM-94-040 RESULTING FROM YUCCA MOUNTAIN QUALITY ASSURANCE DIVISION (YMQAD) AUDIT YMP-94-05 OF TECHNICAL AND MANAGEMENT SUPPORT SERVICES (SCPB: N/A)

The YMQAD staff has verified the corrective action to CAR YM-94-040 and determined the results to be unsatisfactory because of reasons stated in the enclosed CAR.

Your response, indicating the appropriate corrective action completion date, is required to be submitted to this office within ten working days of the date of this letter. Verification of completion of the required corrective action will be performed after the date provided.

If you have any questions, please contact either Robert B. Constable at 794-7945 or Richard L. Maudlin at 794-7290.

Catherine Hampton for
Richard E. Spence, Director
Yucca Mountain Quality Assurance Division

YMQAD:RBC-575

Enclosure:
CAR YM-94-040

cc w/encl:
[redacted], NRC, Washington, DC
S. W. Zimmerman, NWPO, Carson City, NV
D. K. Chandler, M&O/SAIC, Las Vegas, NV
J. R. Gonzales, M&O/SAIC, Las Vegas, NV
L. D. Foust, M&O/TRW, Las Vegas, NV
R. P. Ruth, M&O/Duke, Las Vegas, NV

cc w/o encl:
W. L. Belke, NRC, Las Vegas, NV
D. G. Sult, YMQAD/QATSS, Las Vegas, NV

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OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CORRECTIVE ACTION REQUEST

1 Controlling Document SP 1.32, Revision 8 — Initial Evaluation, Qualification, Indoctrination and training of T&MSS personnel	2 Related Report No. Audit Report YMP-94-05
3 Responsible Organization SAIC/T&MSS	4 Discussed With P. Chadwick/K. Johnson/J. Harper

5 Requirement:

SP 1.31, Section 3.0 states in part: "Employees may perform quality-affecting activities prior to completing full position qualification;... However, the manager assigning such activities must insure that the employee has been trained to the document(s) governing those activities...have been documented before quality-affecting activities are performed."

6 Adverse Condition:

Contrary to the above, there is no objective evidence to reflect that five individuals, who participated in the review and comment of TMSS/93-003 (Organizational Description), had completed training to SP 1.2, Revision 6, prior to performing the activity.

9 Does a Significant Condition Adverse to Quality exist? Yes___ No x If Yes, Circle One: A B C D E	10 Does a stop work condition exist? Yes___ No x ; If Yes - Attach copy of SWO If Yes, Circle One: A B C	3 Response Due Date: 20 Working days from issuance.

11 Required Actions: [x] Remedial [x] Extent of Deficiency [ ] Preclude Recurrence [ ] Root Cause Determination

12 Recommended Actions:

Revise the "Real Time Training requirement to reflect that the specific procedure to perform the task was read prior to performing the activity.

7 Initiator Richard L. Maudlin 5/19/94 5/19/94	14 Issuance Approved by: QADD Date 5-27-94
15 Response Accepted QAR Date 07/06/94	16 Response Accepted QADD Date 5-12-94
17 Amended Response Accepted QAR Date	18 Amended Response Accepted QADD Date
19 Corrective Actions Verified QAR Date	20 Closure Approved by: QADD Date

REV. 2/14/94

ENCLOSURE

Corrective Action Response for CAR YM94-040

A. Remedial Action

No remedial action is required. The review of TMSS/93-003 (Organizational Description) was conducted in accordance with SP 1.2 (the controlling procedure) and in accordance with the Real-Time Training provisions of SP 1.31. All five individuals cited in the CAR completed real-time training and documented such training on TMSS/098 forms and were included in the QA records package (See NNA.930804.0095 dated 7/28/93). The TMSS/098 form has a statement, written in the past tense - "I read, understood, and complied with the following Procedure....", within the reviewer signature block to facilitate the documentation of real-time training. The reviewer completes the statement by annotating the procedure number and revision level to which the reviewer performed real-time training. The dated certifying signature of each reviewer indicates that real-time training was accomplished prior to the start of the review process and that all mandatory comments were resolved to the satisfaction of the reviewer. The basis for this is provided below:

SP 1.31, Rev. 8, paragraph 4.4.4 provides that the employee performs "... real-time training on... The QA record produced by the activity." The definition of Real-Time Training states.... "This method... requires the individual to read and understand the document prior to performing the activity."

SP 1.2 requires the use of form TMSS/098 that provides for certification the he (she) has completed the required training for the review and performed the review in accordance with the controlling procedure. Paragraph 4.5.7 requires the Reviewer to withhold his signature until all mandatory comments have been resolved. Thus the procedure allows the date of concurrence with the document to follow the training on the procedure.

B. Extent of the Deficiency

N/A. See above.

C. Root Cause Determination

N/A.

D. Corrective Action to Preclude Recurrence

It is understandable that the auditor had some questions about the Real-Time Training documentation. The Real-Time Training process does not always provide documentation of the actual date of the individuals training. The date of the signature may be subsequent to the actual date of the Real-Time Training. The date in the signature block is the date of completion of the review process for the individual reviewer. The signature certifies that training was accomplished prior to review actions.

D. Corrective Action to Preclude Recurrence (continued)

Nevertheless, T&MSS will revisit the Real-Time Training to determine an appropriate future course of action for T&MSS. Additionally, the Document Comment form, TMSS/095, will be modified to provide certification that training was accomplished prior to completion of the Document comment form. These actions will be completed within 90 days of this response by the T&MSS Training and QA managers.

Responsible Manager D K Chandler Date 6/27/94

OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

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CORRECTIVE ACTION REQUEST (CONTINUATION PAGE)

Verification of Corrective Action to CAR YM-94-40

A review of the Interoffice Memorandum from D. Chandler to Distribution, dated 09/09/94, and the sample copy of the Document Comments form, Form No. TMSS/095, was performed.

The results of the evaluation of the above do not acceptably resolve the noted condition. The QARD, Revision 1, Section 2.2.11 (H) states: "Ensure the required indoctrination and training for a specified task is completed prior to performing the task. SP 1.32, which was sited in the CAR appears to support the QARD requirement. What is lacking and was identified during the audit, is that the methodology used to document Real-Time Training is after the fact. The date that this training is documented is after the completion of the task. The statement used in the real time training states in part: "I have read, understood....". The have read implies past tense, but the specific date in which the training took place is not documented. This does not satisfy the minimum requirements set forth in the QARD or SP 1.32. The actual date when the training occurred must be documented and reflect a date prior to the performance of the task.

Please re-evaluate your response and corrective action and take the necessary measures to bring real-time training into compliance with the QARD.

R.L. Maudlin — Date: 10/21/94

Science Applications International Corporation

DKC:PAC:lkb:M94-059
QA: L

INTEROFFICE MEMORANDUM

DATE: September 9, 1994

TO: Distribution

FROM: Douglas K. Chandler, Deputy Project Manager, 517/T-44 DKChandler
Technical and Management
Support Services

SUBJECT: Real-Time Training (SCPB: N/A)

As a result of actions required to respond to Corrective Action Request YM-94-040, the Training Department has performed an assessment of the viability of and documentation method for real time training. Real-time training and its associated documentation method appear to be well understood by T&MSS staff.

Real-time training was initially established by T&MSS in May of 1991 to allow staff members to document their reading prior to performing a quality-affecting activity. It was and still is specifically targeted at documents which are not part of a staff member's baseline training requirements. Typically, these documents govern activities which are not part of an individual's normally assigned responsibilities. Later, the Yucca Mountain Site Characterization Office adapted real-time training into its training procedure (then QMP-02-01) with one difference. That difference allows individuals to not perform real-time training if the document in question is part of the individual's baseline training requirements.

In certain cases, processes may extend for a period of time lasting longer than one day, and the individual performing the process does not document real-time training until the process is finished. Given that T&MSS staff understand that they must perform real-time training prior to performing a quality-affecting activity, the documentation serves as testiment to their performance of training prior to performance of the activity.

There appears to be no added value in changing the real-time training process or documentation method.

101 Convention Center Dr., Ste. 407, Las Vegas, NV 89109 (702) 794-7000
Other SAIC Offices: Albuquerque, Ann Arbor, Arlington, Atlanta, Boston, Chicago, Huntsville, La Jolla, Los Angeles, McLean, Orlando, Santa Barbara, Sunnyvale, and Tucson

It should be noted that real-time training does not and is not intended to take the place of maintenance or continuing training assigned to an individual on a Training Assignment form. Real-time training is intended to be used for activities performed by an individual on an ad-hoc or infrequent basis.

Distribution:
G. Kenton Beall, T-17
Robert S. Bostian, T-28
Michael W. Harris, T-29
Beatrice E. Reilly, T-18
Terry D. Tait, T-46

cc:
L. K. Bouie, T-19
P. A. Chadwick, T-19
D. K. Chandler, T-44
K. B. Johnson, T-38
J. D. Weaver, T-04